KAYE, SCHOLER, FIERMAN, HAYS & HANDLER

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November 29, 1988

Donna R. Searcy Secretary Federal Communications Commission Washington, D. C. 20554

> Amendment of Table of FM Allotments New Port Richey, Florida; Sarasota, Florida; and Sebring, Florida

Dear Ms. Searcy:

Submitted herewith for filing, on behalf of our client, WGUL-FM, Inc., licensee of Radio Station WGUL-FM, New Port Richey, Florida, are an original and four copies of its "Petition for Rulemaking and Request for Issuance of Order to Show Cause" in the above-referenced matter.

Please direct any inquiries concerning this submission to the undersigned.

Respectfully submitted,

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER

Enclosure

BEFORE THE

RECEIVED

Federal Communications Commission

WASHINGTON, D.C. 20554

NOV 2 9 1988

In the matter of

Amendment of Section 73.202(b)
Table of Allotments
FM Broadcast Stations
And Modification of License of
Radio Station WGUL-FM,
New Port Richey, Florida

Federal Communications Commission
Office of the Secretary

RM-6561

MM 93-65

TO: Chief, Policy and Rules Division

PETITION FOR RULEMAKING AND REQUEST FOR ISSUANCE OF ORDER TO SHOW CAUSE

WGUL-FM, INC. ("WGUL"), licensee of Radio Station WGUL-FM, New Port Richey, Florida, pursuant to Section 1.460(q) of the Commission's Rules, hereby petitions the Commission to amend Section 73.202(b) of the Commission's Rules (Table of FM Allotments) to: (a) substitute Channel 288C2 for Channel 288A in New Port Richey, Florida, and to issue an order to show cause why the license for Station WGUL-FM should not be modified to specify operations on the new Channel 288C2 in New Port Richey in lieu of operations on Channel 288A; (b) substitute Cha<u>nnel</u> 282A in lieu of Channel 288A in Sarasota, Florida, and issue an order to show cause why the license for Radio Station WKZM(FM) in Sarasota should not be modified to specify operations on Channel 282A in Sarasota rather than on Channel 288A in that community; and (c) substitute Channel 289A in lieu of Channel 288A in Sebring, Florida, and issue an order to show cause why the license for Radio Station WCAC(FM) in Sebring should not be modified to specify operations on Channel 289A in Sebring rather

than on Channel 288A in that community. In support whereof, it is shown as follows:

I. The WGUL Proposal

Radio Station WGUL-FM presently is licensed to operate on Channel 288A (i.e., on the frequency 105.5 MHz) in New Port Richey, Florida. As noted above, WGUL-FM's present rulemaking petition requests an upgrade in the classification of WGUL-FM from a Class A facility to a Class C2 facility on the station's present frequency, plus a request that the station's license be modified to reflect the change.

In order to accomplish the proposed upgrade of WGUL-FM in compliance with the Commission's standards, WGUL proposes that the Commission change the frequencies of Radio Station WKZM(FM), Sarasota, Florida, and Radio Station WCAC(FM), Sebring, Florida. As noted above, Stations WKZM(FM) and WCAC(FM) are presently authorized to operate on Channel 288A (105.5 MHz). WGUL proposes that the Commission change the WKZM(FM) allotment in Sarasota from Channel 288A to Channel 282A (104.3 MHz). In addition, WGUL proposes that the Commission change the WCAC(FM) allotment in Sebring, Florida from Channel 288A to Channel 289A (105.7 MHz). No other changes to the Commission's FM Table of Allotments (Section 73.202 of the Commission's Rules) are proposed. The following tabulation summarizes the proposed changes.

 Location
 Present
 Proposed

 New Port Richey, FL
 288A
 288C2

 Sarasota, FL
 273C, 288A, 292A
 273C, 282A, 292A

 Sebring, FL
 288A
 289A

II. The WGUL Proposal Will Fully Comply With All Applicable Commission Rules

Annexed hereto as Exhibit 1 is the Technical Statement of John A. Lundin, of the firm of du Triel, Lundin & Rackley, Inc., WGUL's consulting engineers. As is noted in Mr. Lundin's Technical Statement, in order to implement the aforementioned changes in the Table of FM Allotments, in full compliance with all applicable Commission Rules, the use of Channel 282A in Sarasota by WKZM(FM) will require a restriction that the transmitter site of that station be located approximately 6 km (i.e., 3.7 miles) south of the Sarasota, Florida, reference point. The separation study set forth as Table II to Mr. Lundin's annexed Technical Statement is based on an assumed transmitter site for WKZM(FM) which is located approximately 6.5 km (i.e., 4 miles) south of the Sarasota reference point and approximately 8.6 km (i.e., 5.3 miles) southwest of the present WKZM(FM) transmitter site. As is noted by Mr. Lundin, operation of WKZM(FM) on Channel 282A in Sarasota at the assumed site would fully comply with the Commission's minimum separation requirements and principal city coverage requirements. Importantly, Christian Fellowship Mission, Inc., the licensee of WKZM(FM), has entered into an agreement with WGUL-FM in which it

has consented to the proposed transmitter site and frequency changes for WKZM(FM). A copy of that agreement is annexed hereto as Exhibit 2.

As is noted in Mr. Lundin's annexed Technical Statement, the proposed use of Channel 289A in Sebring, Florida, by WCAC(FM) will require the transmitter site of that station to be located approximately 10.1 km (i.e., 6.3 miles) south of the Sebring city reference point. The separation study annexed as Table III to Mr. Lundin's Statement assumes a transmitter site for Channel 289A which is located approximately 10.3 km (i.e., 6.4 miles) of the Sebring reference point and approximately 7.2 km (i.e., 4.5 miles) south of the present WCAC(FM) transmitter site. As is noted by Mr. Lundin, operation of WCAC(FM) on Channel 289A at a transmitter site located as proposed would fully meet the applicable Commission spacing requirements and the requirements of principal city coverage.

It should be noted that Roper Broadcasting, Inc., the licensee of WCAC(FM) in Sebring, Florida, has reached an agreement with WGUL-FM under which Roper Broadcasting, Inc., has consented to the frequency change and to the proposed transmitter site relocation for WCAC(FM) proposed herein by WGUL-FM. A copy of that agreement is annexed hereto as Exhibit 3.

III. <u>Upgrade of WGUL-FM's Facilities</u> <u>Would Serve The Public Interest</u>

The proposed upgrade of WGUL-FM would improve the overall spectrum efficiency of FM allotments by increasing the station's service area and facilitating the provision of service to areas now receiving either marginal WGUL-FM signal or no signal from the station at all.

The Commission must assure the fair, efficient and equitable use of the radio frequency spectrum. 47 U.S.C. §307(b). This statutory mandate would be furthered by the proposed upgrade and improvement of the facilities of WGUL-FM.

In this regard, the proposed upgrade would permit WGUL-FM to improve coverage to a significant population and area. As is noted in the annexed Technical Statement of John A. Lundin, WGUL-FM presently operates on Channel 288A with an effective radiated power of only 3 kW and an antenna height of 78 meters (i.e., 255 feet) above average terrain. However, as a Class C2 facility, WGUL-FM would be permitted to transmit with an effective radiated power of up to 50 kW with an antenna height of 150 meters (i.e., 492 feet) above average terrain.

As is noted by Mr. Lundin in Exhibit 1 hereto, the present predicted 1 mV/m (60 dBu) contour of WGUL-FM encompasses an estimated population of 174,166 persons and a land area of 797

square km. However, operating as a maximum facility Class C2 station, the predicted 1 mV/m contour of WGUL-FM would encompass an estimated population of 1,390,722 persons within a land area of 3,787 square km. This would represent nearly an 800 percent increase in predicted population served by the station and an increase of nearly 475 percent in the area encompassed by the WGUL-FM predicted 1 mV/m contour.

IV. WGUL-FM's Proposal Is Fully Consistent With Commission Rules And Policy To Facilitate FM Upgrades

The proposed upgrade of WGUL-FM is fully consistent with the provisions of Section 1.420(g)(3) of the Commission's Rules. Should the Commission ultimately modify the Table of FM Allotments as proposed herein by WGUL and issue the show cause orders requested by WGUL-FM, WGUL-FM intends to expeditiously file an application for a construction permit to modify the facilities of WGUL-FM to specify operations on Channel 288C2 in New Port Richey, Florida. Moreover, consistent with the agreements reached by WGUL-FM with the respective licensees of WKZM(FM) in Sarasota, Florida, and WCAC(FM) in Sebring, Florida, and consistent with the procedures set forth in Brookville and Punxsutawney, Pennsylvania, DA 88-1423 (Mass Media Bureau September 19, 1988), WGUL hereby states its intention to reimburse the respective licensees of WKZM(FM) and WCAC(FM) in accord with the Commission's decision in Circleville, Ohio, 8 FCC 2d 159 (1967).

As discussed above, the requested allotment changes and show cause orders can be adopted and implemented by the Commission in a manner fully consistent with the Commission's Rules. The substitution of channels proposed herein is legally and technically feasible.

V. Conclusion

WGUL-FM has demonstrated that Channel 288C2 is available for a channel upgrade for WGUL-FM. Commission policy favors the upgrade of existing FM stations, and the proposed upgrade of WGUL-FM is in the public interest.

In light of the foregoing, WGUL-FM respectfully requests that the Commission issue a Notice of Proposed Rulemaking proposing amendment of the Commission's Table of FM Allotments (Section 73.202(b) of the Commission's Rules) to substitute Channel 288C2 for Channel 288A in New Port Richey, Florida, to substitute Channel 282A for Channel 288A in Sarasota, Florida, to substitute Channel 289A for Channel 288A in Sebring, Florida; and that the Commission issue orders to show cause why: (a) WGUL-FM's license should not be modified to specify operations on Channel 288C2; (b) WKZM(FM)'s license should not be modified to specify

operations on Channel 282A; and (c) WCAC(FM)'s license should not be modified to specify operations on Channel 289A.

Respectfully submitted,

WGUL-FM, Inc.

By:

77.73

Kaye, Scholer, Fierman, Hays & Handler The McPherson Building 901 Fifteenth Street, N.W. Washington, D.C. 20005 Its Attorneys

(202) 682-3526

November 29, 2988

27763

Exhibit 1

A Subsidiary of A. D. Ring, P. C.

TECHNICAL STATEMENT SUPPORTING THE PETITION FOR RULE MAKING FROM WGUL-FM, INC.

The firm of du Treil, Lundin, & Rackley, Inc., has been retained by WGUL-FM, Inc., to provide technical information in support of a Petition for Rule Making (Petition). WGUL-FM, Inc., is the licensee of FM Radio Station WGUL-FM on channel 288A (105.5 MHz) at New Port Richey, Florida. The Petition requests an upgrade in classification from A to C2 on the present frequency for station WGUL-FM, plus a request that its license be modified to reflect the change.

In order to accomplish the upgrade in compliance with the Commission's standards, it is also proposed to change the frequencies of station WKZM(FM) at Sarasota, Florida and station WCAC(FM) at Sebring, Florida. Stations WKZM and WCAC are presently authorized to operate on channel 288A (105.5 MHz). It is proposed to change the WKZM Sarasota assignment from channel 288A to channel 282A (104.3 MHz). In addition, it is proposed to change the WCAC Sebring assignment from channel 288A to channel 289A (105.7 MHz). No other changes to the FM Table of

Allotments (Section 73.202 of Commission's Rules) is proposed. The following tabulation summarizes the proposed changes.

Location	Present	Proposed
New Port Richey, FL	288A	288C2
Sarasota, FL	273C, 288A, 292A	273C, 282A, 292A
Sebring, FL	288A	289A

Table I presents the separation study for channel 288C2 from the transmitter site of WTSP-TV on channel 10 at St.

Petersburg, Florida. The WTSP-TV tower is located approximately 9.3 kilometers (5.8 miles) south-southwest from the New Port Richey city reference point, and approximately 8.7 kilometers (5.4 miles) south-southwest of the present WGUL-FM site. As noted above, this Petition also proposes to change the WKZM allotment on channel 288A at Sarasota to channel 282A, and change the WCAC allotment on channel 288A at Sebring to channel 289A.

As shown by Table I with the proposed changes, channel 288C2 can be assigned in compliance with the Commission's minimum separation standards.

Figure 1 is a map showing the area where a channel 288C2 transmitter site must be located based on the information contained in Table I. The present WGUL-FM site, assumed channel

288C2 site (WTSP-TV) and New Port Richey city limits (based on 1980 U.S. Census information) are identified. The assumed channel 288C2 site is approximately 11.6 kilometers (7.2 miles) from the furthest point of the New Port Richey city limits. With maximum permitted Class C2 transmitting facilities (50 kW, 150 meters), the predicted 3.16 mV/m (70 dBu) principal city contour would extend to 32.7 kilometers (20.3 miles). Therefore, principal city coverage will not be a problem for the proposed channel 288C2 allotment.

The proposed New Port Richey allotment upgrade will permit WGUL-FM to improve coverage to a significant population and area. The present WGUL-FM operation on channel 288A is for an effective radiated power of 3 kW and an effective antenna height of 78 meters (255 feet) above the average elevation of the surrounding terrain. As a Class C2 assignment, station WGUL-FM would be permitted transmitting facilities up to an effective radiated power of 50 kW with an effective antenna height of 150 meters (492 feet) above the average elevation of the surrounding terrain. Station WTSP-TV, the site assumed for channel 288C2, operates on channel 10 with an effective antenna height of 454 meters (1,490 feet). Therefore, it is reasonable to assume that maximum Class C2 transmitting facilities can be achieved in the area meeting the channel 288C2 separation standards.

The present WGUL-FM predicted 1 mV/m (60 dBu) contour encompasses an estimated population of 174,166 persons (1980 U.S. Census) and a land area of 797 square kilometers (308 square miles). With a maximum facility Class C2 operation at the WTSP-TV site, the predicted 1 mV/m contour would encompass an estimated population of 1,390,722 persons within a land area of 3,787 square kilometers (1,492 square miles). This would represent nearly a 800% increase in predicted population served and nearly a 475% increase in predicted 1 mV/m service area.

Table II is the separation study for channel 282A at an assumed site near Sarasota. It is proposed to substitute channel 282A for WKZM's present assignment on channel 288A. The use of channel 282A will require a restriction that the transmitter site be located approximately 6 kilometers (3.7 miles) south of the Sarasota city reference point. The separation study (Table II) is based on an assumed site located approximately 6.5 kilometers (4 miles) south of the Sarasota reference point and approximately 8.6 kilometers (5.3 miles) southwest of the present WKZM transmitter site. Table II demonstrates that channel 282A at the assumed site complies with the Commission's minimum separation requirements. As noted by exhibits attached elsewhere in this Petition, the WKZM licensee has consented to the proposed site and frequency changes.

Figure 2 is a map showing the area where a channel 282A transmitter site must be located to comply with the Commission's separation standards. It is based on the information contained in Table II. The present WKZM transmitter site, assumed channel 282A site, and Sarasota city limits (based on information contained in the 1980 U.S. Census) are identified. From the assumed channel 282A site, the furthest point of the Sarasota city limits is approximately 13 kilometers (8.1 miles). With maximum permitted Class A transmitting facilities (3 kW, 100 meters), the predicted 3.16 mV/m (70 dBu) principal city contour would extend to 13.7 kilometers (8.5 miles). Therefore, the Commission's principal city coverage requirement can be met from the assumed channel 282A site with maximum Class A transmitting facilities.

Table III provides the FM separation study for channel 289A from an assumed site near Sebring. It is proposed to change the WCAC present assignment on channel 288A to channel 289A. The use of channel 289A will require the transmitter site to be located approximately 10.1 kilometers (6.3 miles) south of the Sebring city reference point. The channel 289A site assumed in Table III is located approximately 10.3 kilometers (6.4 miles) south of the Sebring reference point and approximately 7.2 kilometers (4.5 miles) south of the present WCAC transmitter

site. Based on the information provided in Table III, channel 289A meets the Commission's minimum required separation standards. As provided by exhibits attached elsewhere in this Petition, the WCAC licensee has consented to the frequency change and site relocation.

Figure 3 is a map showing the area where a channel 289A transmitter must be located based on the information contained in Table III. The present and proposed WCAC sites are shown along with the Sebring city limits (based on 1980 U.S. Census information). The channel 289A assumed site is also identified. The distance to the furthest point of the Sebring city limits from the channel 289A assumed site is approximately 13.2 kilometers (8.2 miles). As noted above, the predicted 3.16 mV/m (70 dBu) principal city contour for a maximum facility Class A operation (3 kW, 100 meters) extends to 13.7 kilometers (8.5 miles). Therefore, compliance with the Commission's principal city coverage requirement appears feasible for channel 289A.

In summary, the FM allotment changes proposed herein, can be made in compliance with the Commission's standards.

Channel 288A can be upgraded to channel 288C2 for station WGUL-FM at New Port Richey, Florida. Channel 282A can be substituted for channel 288A at station WKZM in Sarasota, Florida, and channel

289A can be substituted for channel 288A at station WCAC in Sebring, Florida. All 3 channel changes and site relocations can be made in compliance with the Commission's separation standards, and enable station WGUL-FM to significantly improve its service to the surrounding area.

If there are any questions or need for additional information concerning the technical portion of this Petition, please contact the office of the undersigned.

John A. Lundin

dy Treil, Lundin & Rackley, Inc.

1019 19th Street, N.W.

Washington, D.C. 20036

(202) 223-6700

November 7, 1988

TABLE I

Job Title :WGUL-FM NEW PORT	RICHEY,	FLORIDA	Sep	aration 1	Buffer 65 km
Channel 288C2 (105.5 MHz)		/1	Coordinate	s : 28-1	1-04 82-45-39
Call City Status State FCC File No.	Channel	ERP(kW)	Latitude Longitude		
		100 393.2	27-49-09 82-14-26	128.4	65.26 40 25.26 CLEAR
W285AP LADY LAKE LIC FL BLFT 870902TA	285D 104.9	DA 27.4	28-57-00 81-52-30	45.3	121.30
WBJWFM ORLANDO LIC FL BLH 820712AI	286C 105.1		28-36-17 81-05-13		170.54 105 65.54 CLEAR
D85-345 SOLANA ALC FL The filing window period There is a site restrict			82-01-14 to 8-27-86.		157.40 105 52.40 CLEAR
NEW SOLANA APP FL BPH 860827MK Hearing D87-464					163.37 105 58.37 CLEAR
NEW SOLANA APPM FL BPH 860827MC Petition for leave to ame	105.3	100.0	82-02-01		•
NEW SOLANA APPM FL BPH 860826MA			26-50-53 82-01-54		164.69 105 59.69 CLEAR
NEW SOLANA APPM FL BPH 860827MB Hearing D87-464					164.77 105 59.77 CLEAR
Amended 10-20-86 to change trans. location and Rad. Center AMSL					
NEW SOLANA APPM FL BPH 860827MI Hearing D87-464	287A 105.3	3.00 100.0	26-50-44 82-00-15		166.14 105 61.14 CLEAR
Amended 4-17-87 to change trans.location and Rad. Center AMSL.					
WGULFM NEW PORT RICHEY LIC FL BLH 6522	288A 105.5	3.00 77.7	28-15-32 82-43-54	19.1	8.74 <u>/2</u>

TABLE I (Cont'd)

Job Tit	le :WGUL-FM NEW POR	r RICHEY,	FLORIDA	Sep	aration 1	Buffer	65 km
Channel	288C2 (105.5 MHz)		/1	. Coordinate	s : 28-1	1-04 82	-45-39
Call Status	City State FCC File No.		ERP(kW) HAAT(m)	Latitude Longitude	_	Dist. (km)	Req. (km)
WKZM LIC	SARASOTA FL BLH 6432	288A 105.5	3.00 54.9	27-19-25 82-27-40	162.8	99.87	163 <u>/3</u>
WCAC LIC	SEBRING FL BLH 4041	288A 105.5	3.00 45.7	27-28-06 81-27-03	121.4	151.52	163 <u>/4</u>
WCAC APP	SEBRING FL BPH 880722ID	288A 105.5	3.00 100.0	27-27-13 81-24-23	121.1	156.11	163 <u>/4</u>
WYKS LIC	GAINESVILLE FL BLH 4780	288A 105.5	3.00 80.8	29-37-52 82-25-18	11.5	163.72 .72	163 CLOSE
WCAC PROP.	SEBRING FL (This Petition)	289A 105.7		27-24-15 81-27-50	123.8	154.3 49.3	105 CLEAR
NEW APP	WATERTOWN FL BPH 871202MF	289A 105.7	3.00 100.0	30-11-47 82-40-48	2.0	223.13 118.13	105 CLEAR
NEW APP	ENGLEWOOD FL BPH 870910NG	290A 105.9	3.00 100.0	27-00-52 82-22-59	163.9	134.91 79.91	55 CLEAR
WOCL LIC	DELAND FL BLH 870721KC	290C 105.9	100 481.9	28-55-16 81-19-09	59.5	163.01 58.01	105 CLEAR

^{**} End of separation study for Channel 288C2 **

Massed on an assumed site, the tower of WTSP-TV on Channel 10 at St. Petersburg, Florida.

^{/2} Present WGUL-FM site.

^{/3} This Petition also proposes to change the WKZM allotment at Sarasota from Channel 288A to Channel 282A.

<u>/4</u> This Petition also proposes to change the WCAC allotment at Sebring from Channel 288A to Channel 289A.

TABLE II

Job Title :WKZM(FM) SARASOTA, FLORIDA			Sep	aration D	Buffer	40 km	
Channel	282A (104.3 MHz)		/1	Coordinates	: 27-16-	-40 82·	-31-50
Call Status	City State FCC File No			Latitude Longitude			Req. (km)
WRCC APP	CAPE CORAL FL BPH 880623ID		50.0 83.2	26-38-19 82-01-35			55 CLEAR
WRCC ALC	CAPE CORAL FL	279C2 103.7	.0	26-38-19 82-01-35			55 CLEAR
NEW-T APP	ST. PETERSBURG FL BPFT 870331YF		0.01 DA .0	27-52-50 82-37-27	352.2	67.44	
WSSP LIC	COCOA BEACH FL BLH 850508KC	281C 104.1	100 487.1	28-34-51 81-04-32	44.3		169 CLEAR
WEATFM CP	WEST PALM BEACH FL BPH 840609AV	282C1 104.3		26-34-37 80-14-32	108.4	240.18 44.18	
WEATFM ALC D87-4	WEST PALM BEACH FL 483 ds reflect a site r	282C 104.3 estrictio	.0	26-30-00 80-10-00 miles Sout			222 CLEAR
WRBQFM LIC	TAMPA FL BLH 6052 et 80-90 Reclassifi	284C1 104.7	100	27-56-50 82-27-35	5.3	74.52 .52	74 CLOSE
W285AR LIC	FORT MYERS FL BLFT 870302TB		0.01 DA 73.2	26-38-47 81-52-06	136.8	96.02	

^{**} End of separation study for channel 282A **

^{/1} From an assumed reference site located approximately 6.5 kilometers (4 miles) south from the Sarasota city reference point.

TABLE III

Job Title	:WCAC(FM) SEBRING,	FLORIDA	A.	Sepa	ration E	Buffer	40 km
Channel 28	89A (105.7 MHz)		<u>/1</u>	Coordinates	: 27-24	-15 81-	-27-50
Call Ci Status St	tate FCC File No.		ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru		Req. (km)
WBJWFM OR	RLANDO	286C 105.1	100 399.3	28-36-17 81-05-13	15.4	138.12 33.12	105 CLEAR
				o 8-27-86.		76.45 49.45	
		288A 105.5	3.00 45.7	27-28-06 81-27-03	10.2	7.24	/2
	EBRING L BPH 880722ID	288A 105.5	3.00 100.0	27-27-13 81-24-23	45.9	7.91	/2
		288A 105.5		27-19-25 82-27-40	265.0	99.07 35.07	
		288C2 105.5		28-11-04 82-45-39	304.4	154.3 49.3	
APPM FI	NGLEWOOD L BPH 870908MX d 6-13-88 to change	105.9	100.0	27-01-07 82-17-10 ter AMSL.	242.4	91.99 27.99	
NEW EN	NGLEWOOD L BPH 870910 MA	290A 105.9	3.00 100.0	27-01-15 82-17-39	242.8	92.58 28.58	64 CLEAR
NEW EN	NGLEWOOD L BPH 870910MR	290A 105.9	3.00 100.0	27-00-14 82-18-17	242.0	94.39 30.39	

35.17 CLEAR

36.79 CLEAR

64

100.79

TABLE III (Cont'd)

FM SEPARATION STUDY

Job Title : WCAC(FM) SEBRING, FLORIDA Separation Buffer 40 km Coordinates: 27-24-15 81-27-50 Channel 289A (105.7 MHz)Call City Channel ERP(kW) Latitude Bearing Dist. Req. Status State FCC File No. Freq. (km) HAAT (m) Longitude deg-Tru (km) NEW **ENGLEWOOD** 290A 3.00 26-59-59 241.8 94.56 64 **BPH** APP FL 870910MK 105.9 100.0 82-18-15 30.56 CLEAR NEW **ENGLEWOOD** 290A 3.00 26-58-31 240.4 95.90 64 APP BPH FL870909ML 100.0 82-18-16 31.90 CLEAR 105.9 **ENGLEWOOD** 290A NEW 3.00 26-58-17 240.6 97.63 64 APP FL **BPH** 870910MN 105.9 100.0 82-19-19 33.63 CLEAR NEW **ENGLEWOOD** 290A 3.00 26-58-13 97.69 240.6 64 **BPH** APP 870910MY 105.9 100.0 82-19-19 33.69 CLEAR NEW **ENGLEWOOD** 290A 3.00 26-57-52 240.2 97.94 64 APP BPH 8709100G 105.9 100.0 82-19-16 33.94 CLEAR NEW **ENGLEWOOD** 290A 3.00 98.26 26-57-42 240.1 64 APP FL BPH 100.0 34.26 CLEAR 870910MW 105.9 82-19-23 **ENGLEWOOD** NEW 290A 3.00 26-57-43 240.2 98.27 64 APP FL **BPH** 8709100A 105.9 100.0 82-19-24 34.27 CLEAR **ENGLEWOOD** NEW 290A 3.00 26-57-54 240.6 98.79 64 **BPH** 870910NS APP FL 105.9 100.0 82-19-53 34.79 CLEAR NEW **ENGLEWOOD** 290A 3.00 26-56-07 238.5 99.17 64

100.0

3.00

100.0

82-18-58

27-00-52

82-22-59

244.7

APP

APP

NEW

BPH

BPH

ENGLEWOOD

FL

870910MM

870910NG

105.9

290A

105.9

TABLE III (Cont'd)

Job Title :WCAC(FM) SEBRING, FLORIDA	Separation Buffer 40 km
Channel 289A (105.7 MHz)	Coordinates: 27-24-15 81-27-50
Call City Channel ERP(kW) Status State FCC File No. Freq. HAAT(m)	Latitude Bearing Dist. Req. Longitude deg-Tru (km) (km)
WOCL DELAND 290C 100 LIC FL BLH 870721KC 105.9 481.9	28-55-16 4.8 168.71 169
NEW FORT LAUDERDALE 290C 100 D APPD FL BPH 830510AL 105.9 310.9 Denied in partial Initial Decision 5-15- Mutually exclusive with renewal of WAXY,	80-10-27 33.31 CLEAR 87.
WAXY FORT LAUDERDALE 290C 100 D LIC FL BLH 850409KC 105.9 310.9 Renewal Hearing D84-1112	A 25-59-34 140.5 202.31 169 80-10-27 33.31 CLEAR
NEW FORT LAUDERDALE 290C 100 D APPD FL BPH 830512CP 105.9 310.9 Denied in partial Initial Decision 5-15- Mutually exclusive with renewal of WAXY,	80-10-27 33.31 CLEAR 87.
NEW FORT LAUDERDALE 290C 100 D APPG FL BPH 830511AK 105.9 310.9 Granted in partial Initial Decision 5-15 Mutually exclusive with renewal of WAXY,	80-10-27 33.31 CLEAR -87.
D88-80 FORT MYERS VILLAS 291A PADD FL RM 5625 106.1 .0 Extension of time filed 4-18-88 is denied Coords reflect a site restriction of 2.6 Allocation used in Cape Coral, FL - Substitute of 10 coral of 2.6 coral of	miles East of city.

TABLE III (Cont'd)

FM SEPARATION STUDY

Job Title : WCAC(FM) SEBRING, FLORIDA Separation Buffer 40 km Channel 289A (105.7 MHz) Coordinates: 27-24-15 81-27-50 Call City Channel ERP(kW) Latitude Bearing Dist. Req. HAAT(m) Longitude deg-Tru State FCC File No. Freq. (km) WWOJ AVON PARK 292A 2.36 27-33-37 350.5 17.55 27 FL BLH 870113KB 106.3 LIC 112.8 81-29-36 -9.45 SHORT Frequency move to channel 256A, Docket 87-455, RM-6224 <u>/5</u>

- ** End of separation study for channel 289A **
- /1 Based on assumed reference site located approximately 10.3 kilometers (6.4 miles) south of the Sebring city reference point.
- /2 Present and proposed WCAC operations on Channel 288A. It is proposed to change the frequency from Channel 288A to Channel 289A.
- /3 This petition also proposes to change the WKZM Channel 292A operation to Channel 282A.
- /4 In accordance with section 73.208 of the Commission's Rules, the calculated distance is rounded to the nearest kilometer which meets the minimum separation requirement.
- /5 In MM Docket 87-455 it is proposed to change the WWOJ(FM) assignment on Channel 292A at Avon Park, Florida to Channel 256A (99.1 MHz).

